

**West Lake Landfill site, Bridgeton Missouri**  
**CERCLA History**  
**April 2, 2015**

- National Priority Listing (NPL) for West Lake
  - West Lake Landfill was listed on the NPL in 1990 (See 55 FR 35502-25512, Aug. 30, 1990).
  - The NPL listing package was primarily based on radioactive contamination; however, the narrative summary mentions that there are other chemical contaminants in the landfill.
  - NPL listings are based on data of a sufficient nature to list the site but are not inclusive of all contaminants that may present an unacceptable risk and do not define the areal of extent of contamination.
    - As noted in a 2012 HRS listing: *The HRS does not require scoring all pathways if scoring those pathways does not change the listing decision. The HRS is a screening model that uses limited resources to determine whether a site should be placed on the NPL for evaluation and possible Superfund response. A subsequent stage of the Superfund process, the remedial investigation (RI), characterizes conditions and hazards at the site more comprehensively.*
- For the West Lake site, Operable Unit (OU) 1 deals with landfills that contain RIM (and other chemicals) and OU2 deals with the other non-RIM landfills at the NPL site.
- OU1 had a Record of Decision (ROD) signed in 2008. Subsequent to the signature of the ROD, concerns were raised by the Missouri Coalition for the Environment and others regarding EPA's decision to cap the Site and leave RIM in place. As a result, the Agency chose to more thoroughly explore other potential alternate remedies, including full and partial excavation. That has been the primary focus of work over the last few years, including the NRRB consultation and ongoing work supported by OSRTI, ORD, and others.
- OU2 (non-RIM landfills) had a separate ROD signed in 2008 for the non-radiation portion of the site.
  - The ROD for OU2 (non-RIM landfills) states: "For areas operated under state permit, i.e., the Former Active Sanitary Landfill and the Closed Demolition Landfill, the terms of their respective permits dictate the appropriate closure and post-closure care requirements. Successful completion of these requirements would eliminate the need for further CERCLA action at these units. Consistent with EPA's policy on coordination between the Resource Conservation and Recovery Act and CERCLA actions, these regulated units are deferred to the state regulatory program."
  - The OU2 ROD indicates that the Former Active Sanitary Landfill, also known as the Bridgeton Landfill, is part of the OU2 area. The OU2 ROD requirements include:
    - Installation of landfill cover meeting state sanitary landfill requirements

- Groundwater monitoring consistent with requirements for sanitary landfills
  - Surface water runoff control
  - Gas monitoring and control consistent with sanitary landfill requirements
  - Institutional Controls
  - Surveillance and maintenance of the remedy
- Because of the deferral, all of the activities and issues related to the Bridgeton Landfill have been led and managed by the State. This includes management of the off-gassing, which has been an issue of significant community interest.
- The following maps are attached (please note the “North” arrows as the orientation can vary from one map to the next):
  - West Lake Landfill OU-2 map
    - Shows the the overall boundaries and state permit coverages
  - West Lake Site Layout for OU-1, which shows Radiological Areas 1 and 2
  - West Lake Site vicinity map
- There also has been some recent discussion regarding a recent flyover.
  - Based on discussions with the Region, we understand that, in February 2015, a local fire department official conducted a flyover using an infrared camera that supposedly indicated that the North Quarry of the Bridgeton Landfill may have elevated temperatures. Immediately north of the North Quarry is where RIM was found during 2014 sampling associated with locating an isolation barrier between the RIM and the SSE. This could have led to the conclusion that the subsurface smoldering event may have migrated to the radiation contamination areas.
  - However, it appears that the State and the Region have determined that the data from that flyover are not credible, due to concerns with the overall process, equipment, etc.
  - Thus, the Region and the State are no longer addressing the flyover. The Region continues coordination with the state on review of the data from the temperature probes and gas extraction wells to evaluate the possible movement of the SSE.